IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CEDRIC WILLIS	§	
612 GRIFFITH PARK TRL	§	
ALVARADO TX	§	
Plaintiffs,	§	
	Š	
v.	Š	No. 3:25-cv-516-G-BN
	Š	
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U.S. BANK TRUST NATIONAL	8	
ASSOCIATION, AS TRUSTEE	8	
IGLOO SERIES VI TRUST,	8	
LOANCARE, LLC,	8	
SECURITY NATIONAL MORTGAGE	8	
COMPANY,	3	
Defendants.		

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

TO THE HONORABLE UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Plaintiff Cedric Willis, pro se, and respectfully files this Motion for Leave to File Amended Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Civil Rule 15.1, and would respectfully show the Court as follows:

I. INTRODUCTION

Plaintiff seeks leave to file an Amended Complaint to correct, clarify, and supplement factual allegations and legal claims. This motion is timely filed pursuant to the Court's Initial Scheduling Order (Dkt. No. 27), which requires motions for leave to amend pleadings to be filed by April 29, 2025.

This request is made in good faith and not for the purpose of delay. Allowing amendment at this stage will not prejudice Defendants, and no dispositive motions have yet been ruled upon.

II. ARGUMENT AND AUTHORITIES

Rule 15(a)(2) provides that "[t]he court should freely give leave when justice so requires." FED. R. CIV. P. 15(a)(2). The Fifth Circuit recognizes that leave to amend should generally be granted absent undue delay, bad faith, dilatory motive, repeated failure to cure deficiencies, undue prejudice, or futility. See Smith v. EMC Corp., 393 F.3d 590, 595 (5th Cir. 2004).

Here:

- Plaintiff seeks to more precisely set forth his claims;
- No undue prejudice will result to Defendants; and
- Plaintiff will file a clean and redlined version of the proposed amended complaint, in compliance with Local Rule 15.1.

III. PRAYER

For these reasons, Plaintiff respectfully requests that this Court grant leave to file the attached Amended Complaint and for such other relief to which he may be justly entitled.

Respectfully submitted,

/s/ Cedric Willis Cedric Willis, Pro Se 612 Griffith Park Trail Alvarado, Texas 76009 (817) 504-6141 cedricwillis49@yahoo.com

Date: April 29, 2025

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025, I served a true and correct copy of the foregoing Plaintiff's Motion for Leave to File Amended Complaint, together with the proposed amended complaint, upon the following parties via the Court's CM/ECF electronic filing system or by email and/or first-class mail:

Via Email:

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/s/ Cedric Willis Cedric Willis, Pro Se